
EXHIBIT A

From: [Max Ciccarelli](#)
To: [Halima Shukri Ndai](#); [Cohen, Justin S \(DAL - X61211\)](#); [STPurdueHKService](#)
Cc: [Michael Shore](#); [Chiji Ofor](#); [Alicia Cary-Howell](#)
Subject: RE: Purdue ST - Discovery Dispute Chart
Date: Monday, August 22, 2022 4:24:44 PM

CAUTION: External Email!

Halima,

Thanks for the reminder, and my apologies for not getting you this update on Friday.

Rog. 15. None of the people listed on the organization chart that we produced for the SiC Power Device Design Group have attended Purdue. We can add this to our next supplementation.

Rog. 16. We will amend our interrogatory to identify Mario Saggio at the next supplementation (see below regarding timing).

RFP 10 and 11. With respect to RFP 10, some of the persons I needed to speak to were not back from vacation as I had been told, and just got back this week. They are in the process of looking for reports of reverse engineering of ST's SiC MOSFETs but need a few days to complete their search, and then we will need to review before processing. With respect to RFP 11, Purdue chose to include that in the dispute chart.

Given that we are close to completing production of process flows and GDS data, I thought a single supplementation that would provide the updated correlations as well as the above supplementations would be advisable. Please let me know if you disagree with this approach and we can discuss.

Please let me know if you have any questions.

Max Ciccarelli

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From: Halima Shukri Ndai <hndai@shorefirm.com>

Sent: Monday, August 22, 2022 1:27 PM

To: Max Ciccarelli <max@CiccarelliLawFirm.com>; Cohen, Justin S (DAL - X61211) <Justin.Cohen@hklaw.com>; STPurdueHKService <STPurdueHKService@hklaw.com>

Cc: Michael Shore <mshore@shorefirm.com>; Chiji Ofor <coffor@shorefirm.com>; Alicia Cary-Howell <acary-howell@shorefirm.com>

Subject: RE: Purdue ST - Discovery Dispute Chart

Max,

Purdue withdrew ROGs 15 and 16 and RFP 10 from the dispute chart that was submitted to the Court last week based on your August 19th commitment below. However, we still have not received supplemental responses or an update regarding these requests. Please confirm the supplemental responses and responsive materials will be provided today.

Best,
Halima Shukri

From: Halima Shukri Ndai

Sent: Wednesday, August 10, 2022 5:33 PM

To: Max Ciccarelli <max@CiccarelliLawFirm.com>; Michael Shore <mshore@shorefirm.com>

Cc: Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>; Team-Purdue-ST <Team-Purdue-ST@shorechan.com>; STPurdueHKService <STPurdueHKService@hklaw.com>; John Lahad <jlahad@SusmanGodfrey.com>; Brian Melton <BMelton@SusmanGodfrey.com>

Subject: RE: Purdue ST - Discovery Dispute Chart

Max and Justin,

Attached please find a revised dispute chart (and all referenced exhibits) in light of ST's commitment to provide information responsive to ROGs 15 and 16 and RFP 10 by August 19, 2022. However, RFP 11 remains pending. As discussed during the meet and confer, to the extent ST has in its possession reverse engineering data related to competitor devices, such materials must be produced in response to RFP 11.

Best,
Halima Shukri

From: Max Ciccarelli <max@CiccarelliLawFirm.com>

Sent: Wednesday, August 10, 2022 3:55 PM

To: Michael Shore <mshore@shorefirm.com>; Halima Shukri Ndai <hndai@shorefirm.com>

Cc: Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>; Team-Purdue-ST <Team-Purdue-ST@shorechan.com>; STPurdueHKService <STPurdueHKService@hklaw.com>; John Lahad <jlahad@SusmanGodfrey.com>; Brian Melton <BMelton@SusmanGodfrey.com>

Subject: RE: Purdue ST - Discovery Dispute Chart

CAUTION: External Email!

Michael, I am not with Holland & Knight—never been—so please don't let my decision to take a day off work reflect badly on the HK team. Today was on me. I had not seen my son for several months and wanted to spend a little time with him before he heads back to college. It is not an excuse, and if you would like pictures and videos I'll gladly share those with you. Several of the issues on your current chart are issues that I have been heading up, and because I have the best knowledge I

wanted to be involved to make sure we give you correct information.

Halima,

Rog. 15. Yes, because Purdue did not accept our offer, we modified our position slightly. Nevertheless, if it will resolve the dispute, and if Purdue is willing to limit the universe of people to those listed on the organization chart that we produced for the SiC Power Device Design Group, we can identify the people from that group that have attended Purdue. We can do that by August 19, 2022.

Rog. 16. Pursuant to the proposal set forth in our section of the dispute chart, we can amend our interrogatory response to identify Mario Saggio by August 19, 2022.

RFP 10 and 11. If Purdue is ok with the approach set forth in our section of the dispute chart, we can conduct the investigation next week when the witness returns from vacation, and provide you an update as to our finding by August 19, 2022.

Please let us know if that will resolve the disputes for the above discovery requests.

Max Ciccarelli

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From: Michael Shore <mshore@shorefirm.com>

Sent: Wednesday, August 10, 2022 11:52 AM

To: Max Ciccarelli <max@CiccarelliLawFirm.com>; Halima Shukri Ndai <hndai@shorefirm.com>

Cc: Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>; Team-Purdue-ST <Team-Purdue-ST@shorechan.com>; STPurdueHKService <STPurdueHKService@hklaw.com>; John Lahad <jlahad@SusmanGodfrey.com>; Brian Melton <BMelton@SusmanGodfrey.com>

Subject: RE: Purdue ST - Discovery Dispute Chart

The excuses for delays Holland & Knight can come up with are endless. Next will be a dog ate it. How long does it take to get a date from a client on an issue that has been pending for weeks? Why is Max the only one who can ask ST simple questions?

From: Max Ciccarelli <max@CiccarelliLawFirm.com>

Sent: Wednesday, August 10, 2022 10:53 AM

To: Halima Shukri Ndai <hndai@shorefirm.com>

Cc: Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>; Michael Shore <mshore@shorefirm.com>; Team-Purdue-ST <Team-Purdue-ST@shorechan.com>; STPurdueHKService <STPurdueHKService@hklaw.com>

Subject: Re: Purdue ST - Discovery Dispute Chart

CAUTION: External Email!

Halima,

My youngest son is in town and I have not seen him for several months, and so am spending the day with him today and not working. I will however, try to push these issues forward, but may not have a final position until tomorrow.

Max Ciccarelli

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On Aug 10, 2022, at 8:17 AM, Halima Shukri Ndai <hndai@shorefirm.com> wrote:

Max,

The only reason some of these requests (ROGs 15, 16, and 17, and RFPs 10 and 11) ended up on the dispute chart is because you never gave us ST's final position, including a date certain for production and supplementation, on the parties' proposals. Purdue's agreement on each issue is evident from the dispute chart. So as not to bother the Court with moot issues, provide a date certain for supplementing ST's responses to ROG 16 RFPs 10 and 11 by noon today.

Additionally, based on your email and portion of the dispute chart, we understand ST is willing to supplement ROG 17 and "to identify the lead applications engineer for the 3 largest customers of SiC MOSFETs identified in its sales report that have applications engineers assigned to them." Please provide a date certain for supplementation by noon today and we will withdraw the dispute regarding the ROG 17.

Finally, is ST reneging on its own proposal regarding ROG 15? If that is the case, then this issue remains pending.

Best,

Halima Shukri

From: Max Ciccarelli <max@CiccarelliLawFirm.com>
Sent: Tuesday, August 9, 2022 6:47 PM
To: Halima Shukri Ndai <hndai@shorefirm.com>
Cc: Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>; Michael Shore <mshore@shorefirm.com>; Team-Purdue-ST <Team-Purdue-ST@shorechan.com>; STPurdueHKService <STPurdueHKService@hklaw.com>
Subject: Re: Purdue ST - Discovery Dispute Chart

CAUTION: External Email!

Halima,

Identifying the application engineer for the top three SiC MOSFET customers was a proposal we made with the hope that you would find it acceptable and thus resolve the issue. The fact that you submitted the issue to the Court tells me that you did not consider that approach acceptable. If your email is signaling that Purdue is willing to accept the proposal, we can try to get you a date certain.

Let us know. Thanks.

Max Ciccarelli

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On Aug 9, 2022, at 5:51 PM, Halima Shukri Ndai <hndai@shorefirm.com> wrote:

Justin,

With respect to ROG 17, please provide a date certain when ST “will identify the lead applications engineer for the 3 largest customers of SiC MOSFETs identified in its sales report that have applications engineers assigned to them.”

Best,
Halima Shukri

From: Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>
Sent: Tuesday, August 9, 2022 5:41 PM
To: Halima Shukri Ndai <hndai@shorefirm.com>

Cc: Michael Shore <mshore@shorefirm.com>; Team-Purdue-ST <Team-Purdue-ST@shorechan.com>; Max Ciccarelli <Max@CiccarelliLawFirm.com>; STPurdueHKService <STPurdueHKService@hklaw.com>

Subject: RE: Purdue ST - Discovery Dispute Chart

CAUTION: External Email!

Counsel - attached is ST's portion of the dispute chart and exhibit. If you request a hearing, please specify that the hearing will involve ST's confidential material. Our expectation is that the hearing and the transcript will need to be designated as O-AEO under our protective order.

Thank you,

~Justin

Justin S. Cohen | Holland & Knight

Direct 214.969.1211 | Cell 214.605.1993

[Add to address book](#) | [View professional biography](#)

From: Halima Shukri Ndai <hndai@shorefirm.com>

Sent: Friday, August 5, 2022 5:29 PM

To: Max Ciccarelli <Max@CiccarelliLawFirm.com>; Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>; STPurdueHKService <STPurdueHKService@hklaw.com>

Cc: Michael Shore <mshore@shorefirm.com>; Team-Purdue-ST <Team-Purdue-ST@shorechan.com>

Subject: Purdue ST - Discovery Dispute Chart

[External email]

Counsel,

Attached please find a dispute chart regarding Purdue's 2nd and 3rd sets of Discovery, along with referenced exhibits. Please fill in your portion and return by Tuesday so that we can submit to the Court.

Best,



Halima Shukri Ndai

The Shore Firm

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